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February 14, 2023

By ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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MEMO ENDORSED

Re: United States v. Milton Palacio, 21-cr-603 (VEC)

Dear Judge Caproni:

We represent Defendant Milton Palacio in the above-referenced action. On January 30, the Court sentenced Mr. Palacio to a sentence of time served with a three-year term of supervised release, which included conditions requiring Mr. Palacio to perform 150 hours of community service per year and complete an in-person class on personal finance. For the reasons explained below, we write to respectfully request that the Court issue an order allowing Mr. Palacio to relocate to Puerto Rico so that he can commence his upcoming employment as an assistant basketball coach for the Guaynabo Mets in the Puerto Rican professional basketball league.

As we detailed in our sentencing memorandum, Mr. Palacio has secured employment as an assistant coach in the Puerto Rican professional basketball league. *See* ECF No. 767 at 2, 10, 14. That job is scheduled to commence this month. After his sentencing, Mr. Palacio promptly met with his Colorado-based Probation Officer (Angela Loveless), informed her of his prospective position with the Guaynabo Mets, and provided her with all relevant paperwork relating to his employment. Officer Loveless has informed us that from an administrative perspective, the process of Mr. Palacio relocating to Puerto Rico will be substantially facilitated by a Court order providing that Mr. Palacio be allowed to travel to and reside in Puerto Rico for the purposes of his employment with the Guaynabo Mets. To be clear, Mr. Palacio intends to comply with and fulfill all terms of his supervised release from Puerto Rico.¹

¹ When I asked Officer Loveless whether she has any objection to Mr. Palacio relocating to Puerto Rico, she informed me that her typical practice is not to state any position to counsel. Rather, she indicated that

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We have discussed our request with the Government, and the Government has informed us that it has no objection.

We thank the Court for its attention to this issue.

Respectfully submitted,

/s/ Benjamin S. Fischer
Benjamin S. Fischer

Application GRANTED.

SO ORDERED.

 02/15/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

she is available to discuss the issue with the Court should the Court have any questions. We are happy to provide the Court with Officer Loveless's contact information if the Court would like to contact her.